

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking on the
Commission's Own Motion to Assess and
Revise the Regulation of Telecommunications
Utilities.

Rulemaking for the Purposes of Revising
General Order 96-A Regarding Informal
Filings at the Commission.

Rulemaking 05-04-005
(Filed April 7, 2005)

Rulemaking 98-07-038
(Filed July 23, 1998)

**COMMENTS OF THE CALIFORNIA ASSOCIATION OF
COMPETITIVE TELECOMMUNICATIONS COMPANIES
ON THE PROPOSED DECISIONS OF COMMISSIONER
CHONG ISSUED JULY 23, 2007**

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Date: August 13, 2007

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, the California Association of Competitive Telecommunications Companies ("CALTEL")¹ hereby submits reply comments on behalf of its members on the two Proposed Decisions of Commissioner Chong dated July 23, 2007 which clarify rules for advice letters, adopt procedures for detariffing, and adopt Telecommunications Industry

¹ CALTEL is a non-profit trade association working to advance the interests of fair and open competition and customer-focused service in California telecommunications. CALTEL members are entrepreneurial companies building and deploying next-generation networks to provide competitive voice, data, and video services. The majority of CALTEL members are small businesses who help to fuel the California economy through technological innovation, new services, affordable prices and customer choice.

Rules for General Order (GO) 96-B.²

CALTEL congratulates the Commission on nearing completion of the lengthy process of trying to match the level of regulation to an increasingly competitive telecommunications marketplace. CALTEL believes, however, that a few minor modifications should still be made to assure that the traditionally competitive carriers are not penalized as a result of the move to lighter regulation for incumbent carriers.

Following CALTEL's review of both Proposed Decisions (PDs), CALTEL has concluded that the term "URF Carrier" found throughout the proposed industry rules (Appendix A of the GO 96-B PD) is intended to include all carriers except those ILECs still subject to rate-of-return regulation (referred to as the General Rate Case, or GRC-ILECs). Accordingly, in these comments, CALTEL recommends changes to the ways that carrier classification terms are defined and used throughout the proposed rules.

CALTEL also recommends, 1.) exempting detariffed services offered to wholesale and business customers from the requirements outlined in Rule 5.2; 2.) other clarifying changes to proposed Rule 5.2; and 3.) elimination of the new, perhaps inadvertent, requirement to provide 30-day notice to customers for change-in-control applications.

² On July 23, 2007, two proposed decisions were issued in R.05-04-005 and R.98-07-038 which have subsequently been consolidated pursuant to Chief Administrative Law Judges Ruling dated August 10, 2007: Opinion Consolidating Proceedings, Clarifying Rules for Advice Letters Under the Uniform Regulatory Framework, and Adopting Procedures for Detariffing (hereinafter, URF PD) and Opinion Adopting Telecommunications Industry Rules (hereinafter, GO 96-B PD).

II. COMMENTS

A. THE TERM “URF CARRIER” IS NOT DEFINED IN THE PHASE 1 URF DECISION AND IN ANY EVENT SHOULD BE SPECIFICALLY DEFINED AND CONSISTENTLY USED THROUGHOUT THE GO 96-B INDUSTRY RULES

Rule 1.14 of the proposed Telecommunications Industry Rules (Appendix A of the GO 96-B PD) defines an “URF Carrier” as a “public Utility that is regulated through the Commission’s uniform regulatory framework, as established in Decision 06-08-030 and as modified from time to time by the Commission”. However, CALTEL was unable to locate any such definition in the Phase 1 URF Decision, and was only able to identify regulations adopted for the URF proceeding respondents (AT&T, Verizon, Surewest and Citizens) that were *specifically extended* to Competitive Local Carriers (CLCs).

The URF PD includes several references that suggest that the Commission intends to define “URF Carriers” to include the four major ILECs, CLECs (CLCs) as well as IXCs (NDIECs).³ CALTEL has no objection to that definition in principle, as long as the definition of URF Carrier is clearly stated and some modifications are made to the rules to avoid penalizing competitive carriers. CALTEL therefore strongly recommends that Rule 1.14 be clarified to explicitly define the carriers or types of carriers which are intended to be included in this carrier class. Rule 1.5 should be amended by adding the phrase “rather than through the Commission’s uniform regulatory framework described in Rule 1.14.” Similarly, Rules 1.5 and 1.15, which contain the

³ See URF PD at page 6.

other carrier class definitions, should be re-numbered to appear consecutively, and clarified to ensure consistent use throughout (e.g. Rule 1.15 defining a “Utility” should either be clarified to explicitly include URF Carriers and GRC-LECs, or deleted and replaced by the other two terms throughout the rules).

Finally, once these definitions are renumbered and clarified as recommended above, text and headings for Rule 8.6 (Transfers) will need to be clarified to reference the relevant sub-URF Carrier classes, e.g. “Transfer of a GRC-LEC or an URF Carrier that is an Incumbent LEC” and “Transfer of URF Carriers that are CLCs or NDIECs”, accordingly.

B. REQUIREMENTS FOR PUBLISHING RATES, CHARGES, TERMS AND CONDITIONS FOR DETARIFFED SERVICES SHOULD EXEMPT SERVICES PROVIDED TO BUSINESS CUSTOMERS

As CALTEL has described in comments in this and other Commission proceedings, many competitive carriers today primarily serve wholesale and small-to-mid-sized business customers. These carriers typically combine regulated, interstate and intrastate voice service with regulated interstate services such as basic and enhanced private or virtual private network services, high-speed Internet access, as well as unregulated services such as enhanced messaging, conferencing and other advanced services, all over the same facilities. As the spectrum of services and capabilities that can be made available to business customers has expanded and become more complex, and as the economy in which these customers operate has changed and become more global, they have become more demanding in requiring that options and pricing be customized to suit their particular needs. To remain competitive, carriers must be willing and able to

provide the precise mix of services and pricing that these sophisticated customers demand.

While filing tariffs may provide an efficient means to establish rates, terms and conditions for service furnished to mass market residential customers, attempting to separate out and tariff regulated intrastate service plans and prices for commercial customers has proven more and more impractical. Therefore, the optional detariffing rules outlined in the PDs and proposed Industry Rule 5, as well as relief in filing customer contracts that would be achieved as a result of detariffing (as outlined in Rule 4 and Rule 8.2), are welcome and should apply uniformly to the four largest ILECs, CLECs and IXC's, as long as the requirements to publish terms and conditions for detariffed services on carrier websites are limited to services offered to residential customers. Sophisticated business customers are simply not in need to the same levels of protection as mass market residential customers. Moreover, the administrative burden of attempting to maintain detailed information about these complex business services, and archiving that information for a period of three years, would potentially be more time consuming and costly than continuing to file tariffs and related customer contracts. This burden could very well cause CLECs to forgo detariffing their services which is surely not the result the Commission intended.

C. **EVEN IF SERVICES PROVIDED TO BUSINESS CUSTOMERS ARE NOT EXEMPTED, RULE 5.2 SHOULD BE CLARIFIED**

The current wording of proposed Industry Rule 5.2 (and to a lesser degree, Rule 5.3) is particularly confusing and in need of clarification, even if the Commission

chooses not to otherwise exempt services provided to business customers. As it currently reads, the Rule 5.2 could be interpreted to require that carriers publish terms and conditions on their websites for all services “available to the public”, whether intrastate, interstate or unregulated in nature, especially if the carrier had “ever” tariffed the service in the past. As described above, competitive service offerings for commercial customers have evolved significantly over the years, and there have been significant changes in the ways that those services have been classified and regulated at both the state and federal levels. Competitive carriers should not be penalized for voluntarily tariffing services that are not, or no longer are, regulated intrastate services, and should be allowed to detariff without incurring additional obligations. Rule 5 and its sub-parts should be clarified accordingly.

D. CHANGE IN CONTROL ADVICE LETTERS SHOULD NOT REQUIRE 30-DAY CUSTOMER NOTICE

CALTEL respectfully requests the Commission to revisit the inclusion of “transfers of control” to the definition of Transfers in Rule 1.13, thereby creating new, onerous and unnecessary obligations to the already extensive requirements associated with merger and acquisition applications. In the six intervening years since this amendment to the rules was drafted, a great deal of consolidation has occurred in the telecommunications industry, usually with no disruption of service or other discernible impact on end-use customers. The proposed rules appear to mirror those presently in effect regarding a transfer of a customer base where very different public policy considerations apply. In the case of a simple change-in-control, in which the original

service provider continues to operate under the same name with no changes to rates, terms and conditions. These types of transactions, which usually occur at the holding company level, are not currently subject to customer notice requirements and adding such requirements at this point in time, absent a clearly evidenced problem stemming from these transactions, does not serve the public interest. Addition of customer notice requirements to these type of transactions will only result in unnecessary alarm to end-user customers as there will ultimately be no change to the rates, terms and conditions of their service. Accordingly, CALTEL requests that, Rule 3 should be amended to specifically exclude transfers of control from the Rule 3 notice requirements. Rule 5.3 should also be amended to exclude transfers of control.

III. THE LIMITATION ON DETARIFFING OF CURRENT SERVICES TO 18 MONTHS IS UNNECESSARY.

The URF PD with very little discussion limits detariffing requests to within 18 months of the effective date of the decision. The 18 month limitation stands in the way of the very flexibility that detariffing of services is designed to allow. It is entirely possible that a carrier who does not see the benefits of detariffing at this point in time, or within 18 months of the proposed decision, could see the benefit of detariffing at a later date. These carriers should not be denied the ability to detariff services should their needs or business models change. Accordingly, CALTEL believes such a limitation is ill advised and should be deleted.

IV. CONCLUSION

For the reasons described above, CALTEL respectfully requests that the Commission modify the proposed decisions consistent with the discussion herein and, with said minor modifications, expeditiously approve the proposed decisions.

Respectfully submitted this August 13, 2007 at San Francisco, California.

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CERTIFICATE OF SERVICE

I, Lisa Vieland, certify that I have on this 13th day of August 2007 caused a copy of the foregoing

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to be served on all known parties to R.05-04-005 and R.98-07-038 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 13th day of August 2007 at San Francisco, California.

/s/ Lisa Vieland
Lisa Vieland

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